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October 21, 2022

VIA ECF

Hon. Jennifer L. Rochon
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Woodstock Ventures LC, et al. v Woodstock Roots LLC, et al.*
U.S.D.C., S.D.N.Y., No. 1:18-cv-01840-JLR**

Dear Judge Rochon:

We represent Plaintiffs Woodstock Ventures LC and The Woodstock Cannabis Company LLC (“Plaintiffs”). Plaintiffs and Defendants Woodstock Roots LLC, Woodstock Cannabis Company, LLC, Chet-5 Broadcasting, LP, Gary Chetkof, Axcentria Pharmaceuticals LLC, and Woodstock Products Company International, LLC d/b/a Woodstock American Products (“Defendants”) respectfully submit this joint letter to update the Court on the status of discovery in advance of the pretrial conference scheduled for November 2, 2022. ECF No. 169.

Fact discovery is largely complete. Due to a case of COVID this week, the parties were forced to reschedule the only outstanding deposition to October 28, 2022. As a result of this unanticipated delay in completing fact discovery, the parties mutually agreed to exchange expert witness disclosures after that deposition, on October 31, 2022. The only remaining fact discovery are post-deposition document productions, which the parties anticipate completing shortly.

The parties believe fact discovery will be complete as of the November 2, 2022 pre-trial conference and see no need to adjourn that date. We look forward to conferencing this matter with the Court and are available in the meantime should the Court require any additional information.

Respectfully submitted,

/s/ Nicholas J. Faso

cc: All counsel of record via ECF